

Thomas-Jensen

Affirmation

Exhibit # 69

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

C.A. No. 1:25-cv-00039-JJM-PAS

DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

DECLARATION OF CAREY M. WRIGHT

I, Carey M. Wright, declare as follows:

1. I am a resident of the State of Maryland. I am over the age of 18 and I am currently employed by the Maryland State Board of Education as State Superintendent of Schools of the Maryland State Department of Education (“Department”).
2. As the State Superintendent of Schools, I have personal knowledge of the matters set forth below or have knowledge of the matters based on my review of information and records gathered by my staff. If called as a witness, I could and would testify competently to the matters set forth below.
3. The Department is responsible for ensuring a rigorous and world-class educational experience for every Maryland student, in every neighborhood, that prepares each to be college and career ready. The Department’s Division of Early Childhood (“Division”) seeks to protect the health, safety, and welfare of children, and to improve early education in Maryland so that young children are well prepared for school. These critical services are funded through the Child Care and Development Block Grant Act (“CCDBG”) administered by the U.S.

Department of Health and Human Services, Administration for Children and Families. The Child Care Development Fund (“CCDF”) is a federal and state partnership program authorized under the CCDBG. The Department receives CCDF grant funding to reimburse expenditures that were initially paid by the State of Maryland.

4. The Child Care Scholarship Program helps low-income eligible families pay for high-quality child care and early education programs so families can work, attend job training, or educational programs. For fiscal year 2025, the State has appropriated more than \$350,000,000 in Maryland general funds for the Child Care Scholarship Program and other initiatives including child care licensing which protects the health, safety, and welfare of children across Maryland.

5. The Department uses reimbursement from the CCDF to support these critical child care services. On January 28, 2025, the Department attempted to submit a request for reimbursement for Child Care Scholarship funds in the amount of \$31,682,265. The Payment Management Service portal, however, was not accessible. The webpage included a banner stating: “Due to Executive Orders regarding potentially unallowable grant payments, PMS is taking additional measures to process payments. Reviews of applicable programs and payments will result in delays and/or rejections of payments.” The Department was able to draw down the funds at the end of the day on January 28, 2025, but throughout the day the system was not accessible. The Department continues to be concerned that the funding will again be delayed or denied. Any freeze would adversely impact the child care scholarship programs and health, safety, and welfare initiatives.

6. The Department expects the next disbursement of CCDF funds on or about February 28, 2025. For February, March and April 2025, the Department estimates receiving

\$25,783,000 per month in reimbursement from the CCDF under our current federal grant for a total of \$77,349,000.

7. If payments stop, and the State of Maryland is not reimbursed with the CCDF federal funds, this would have a significant fiscal impact on the State and the growing number of Maryland children accessing child care. From FY 2022 to January 2024, there has been a 74.8% increase in the number of families served (totaling 26,505) and a 69.3% increase in the number of children served (totaling 40,632) in the scholarship program. As of February 3, 2025, there are active scholarships for 41,611 children associated with 28,319 families. These children are enrolled with a total of 3,571 unique child care providers.

8. If the federal funding is again paused, blocked, denied or delayed suddenly, the Department will not be able to sustain the programs that the CCDF currently supports. A disruption in CCDF reimbursement funding will adversely impact the Department's budget and the fiscal viability of the Child Care Scholarship Program and other health, safety, and quality initiatives. Suspension of payments to providers will affect the children who benefit from this program, and reduce access to healthy, safe, and quality child care for all children. The undisruptive receipt of CCDF funds stabilizes child care small businesses, supports families who are economically and socially vulnerable, and prepares children to arrive at school ready to learn.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on February 6, 2025, at Baltimore, Maryland.



Carey M. Wright, Ed.D.